

JUDGE DANIELS

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

- - - - - X  
UNITED STATES OF AMERICA :

- v. - :

SEALED INDICTMENT

15 Cr.

15 CRIM 487

RAFAEL OJEDA,  
     a/k/a "Papi,"  
 CALVIN OJEDA,  
     a/k/a "Killa,"  
 JONATHAN OJEDA,  
     a/k/a "Shorty,"  
     a/k/a "Chorty,"  
 SERVANDO JOSE GOMEZ,  
     a/k/a "June,"  
 HECTOR TIRADO,  
     a/k/a "Hec,"  
 TRAVIS PROFIT,  
     a/k/a "Trap,"  
 ANGEL SEPULVEDA,  
     a/k/a "A-Plus,"  
 EDUARDO VAZQUEZ,  
     a/k/a "Spider,"  
 JASON PEREZ,  
     a/k/a "Santana,"  
 TREVIS BOWENS,  
     a/k/a "T-Money,"  
 JHOVY DIONIZIO,  
 CHRISTIAN DUMES,  
     a/k/a "Gordo,"  
 CHRISTIAN RAMOS,  
     a/k/a "Fatboy,"  
 PAQUITO RODRIGUEZ,  
     a/k/a "Frank,"  
 GISETTE RIVERA,  
 SAMUEL PALMER,  
     a/k/a "Junior,"  
 JOSE COLON,  
 ANTOINE HENDERSON,  
     a/k/a "Will,"  
 ADRIEL PONCE,  
     a/k/a "A," and  
 CHRISTOPHER RICHARDSON,  
     a/k/a "C,"  
                     Defendants.

USDC SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #:  
 DATE FILED JUL 27 2015

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COUNT ONE  
(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about May 2014, up to and including in or about July 2015, in the Southern District of New York and elsewhere, RAFAEL OJEDA, a/k/a "Papi," CALVIN OJEDA, a/k/a "Killa," JONATHAN OJEDA, a/k/a "Shorty," a/k/a "Chorty," SERVANDO JOSE GOMEZ, a/k/a "June," HECTOR TIRADO, a/k/a "Hec," TRAVIS PROFIT, a/k/a "Trap," ANGEL SEPULVEDA, a/k/a "A-Plus," EDUARDO VAZQUEZ, a/k/a "Spider," JASON PEREZ, a/k/a "Santana," TREVIS BOWENS, a/k/a "T-Money," JHOVY DIONIZIO, CHRISTIAN DUMES, a/k/a "Gordo," CHRISTIAN RAMOS, a/k/a "Fatboy," PAQUITO RODRIGUEZ, a/k/a "Frank," GISETTE RIVERA, SAMUEL PALMER, a/k/a "Junior," JOSE COLON, ANTOINE HENDERSON, a/k/a "Will," ADRIEL PONCE, a/k/a "A," and CHRISTOPHER RICHARDSON, a/k/a "C," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RAFAEL OJEDA, CALVIN OJEDA, JONATHAN OJEDA, GOMEZ, TIRADO, PROFIT, SEPULVEDA, VAZQUEZ, PEREZ, BOWENS, DIONIZIO, DUMES, RAMOS, RODRIGUEZ, RIVERA, PALMER, COLON, HENDERSON, PONCE, and RICHARDSON, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that RAFAEL OJEDA, CALVIN OJEDA, JONATHAN OJEDA, GOMEZ, TIRADO, PROFIT, SEPULVEDA, VAZQUEZ, PEREZ, BOWENS,

DIONIZIO, DUMES, RAMOS, RODRIGUEZ, RIVERA, PALMER, COLON, HENDERSON, PONCE, and RICHARDSON, the defendants, conspired to distribute and possess with intent to distribute were (a) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A), and (b) mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT TWO  
(Firearms Possession)

The Grand Jury further charges:

4. From at least in or about May 2014, up to and including in or about July 2015, in the Southern District of New York and elsewhere, CALVIN OJEDA, a/k/a "Killa," JONATHAN OJEDA, a/k/a "Shorty," a/k/a "Chorty," SERVANDO JOSE GOMEZ, a/k/a "June," TRAVIS PROFIT, a/k/a "Trap," EDUARDO VAZQUEZ, a/k/a "Spider," and JASON PEREZ, a/k/a "Santana," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

5. As a result of committing the narcotics offense charged in Count One of this Indictment, RAFAEL OJEDA, a/k/a "Papi," CALVIN OJEDA, a/k/a "Killa," JONATHAN OJEDA, a/k/a "Shorty," a/k/a "Chorty," SERVANDO JOSE GOMEZ, a/k/a "June," HECTOR TIRADO, a/k/a "Hec," TRAVIS PROFIT, a/k/a "Trap," ANGEL SEPULVEDA, a/k/a "A-Plus," EDUARDO VAZQUEZ, a/k/a "Spider," JASON PEREZ, a/k/a "Santana," TREVIS BOWENS, a/k/a "T-Money," JHOVY DIONIZIO, CHRISTIAN DUMES, a/k/a "Gordo," CHRISTIAN RAMOS, a/k/a "Fatboy," PAQUITO RODRIGUEZ, a/k/a "Frank," GISETTE RIVERA, SAMUEL PALMER, a/k/a "Junior," JOSE COLON, ANTOINE HENDERSON, a/k/a "Will," ADRIEL PONCE, a/k/a "A," CHRISTOPHER RICHARDSON, a/k/a "C," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the narcotics offense charged in Count One of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT TWO

6. As the result of committing the firearms offense charged in Count Two of this Indictment, CALVIN OJEDA, a/k/a "Killa," JONATHAN OJEDA, a/k/a "Shorty," a/k/a "Chorty," SERVANDO JOSE GOMEZ, a/k/a "June," TRAVIS PROFIT, a/k/a "Trap," EDUARDO VAZQUEZ, a/k/a "Spider," and JASON PEREZ, a/k/a "Santana," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461, any firearm or ammunition involved in or used in the firearms offense charged in Count Two of this Indictment.

Substitute Assets Provision


7. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(b), 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 924, 981 and 982;  
Title 28, United States Code, Section 2461; and  
Title 21, United States Code, Section 853.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

RAFAEL OJEDA, a/k/a "Papi," et al.,

Defendants.

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INDICTMENT

15 Cr. \_\_\_\_\_

(21 U.S.C. § 846; and  
18 U.S.C. § 924(c)(1)(A)(i) and 2.)

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PREET BHARARA  
United States Attorney.

TRUE BILL

FOREPERSON

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7/27/15 - Filed Sealed Indictment  
cc A/W's called.

Judge Maas  
USMJ